



**CRAFTING
INTERCOMPANY
SOLUTIONS**

VECTOR TP
intercompany solutions

**KNOW HOW FORGED IN-HOUSE
AT THE SERVICE OF THE INDUSTRY
AND SERVICE PROVIDERS**

END TO END FINANCIAL AND ECONOMIC SOLUTIONS INTER-COMPANY TRANSACTIONS

STRATEGY & STRATEGIC PLANNING

OPERATIONAL TRANSFER PRICING

BROAD COMMUNICATION & CONTROVERSY

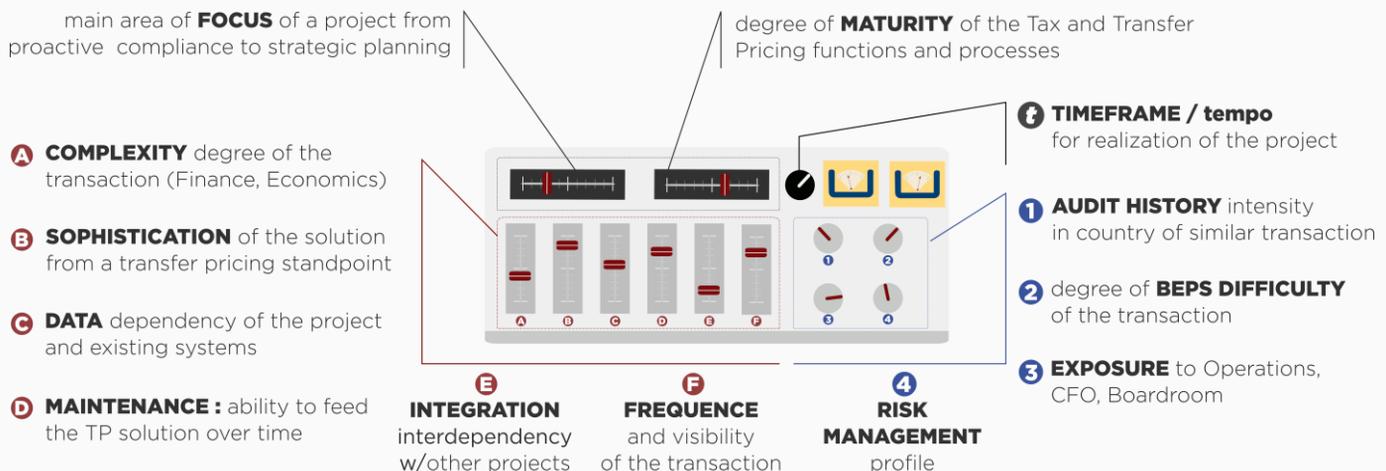
The management of intercompany transactions, both from a transfer pricing/Tax standpoint and from a financial perspective, has been marked over the last years by an unprecedented level of complexity. The latter has emerged from increasingly technical measures and regulations coupled with a surge on scrutiny of pricing policies and operations.

VECTOR TP supports companies to develop integrated approaches to transfer pricing. Our financial and economic solutions aim to allow your organization to:

- Define a technically accurate policy aligned with the tax and finance Objectives, embedding fail safe strategies and risk management
- Ensure an adequate maintenance of such policy in light of available resources and data, to deliver results aligned with financial and TP objectives.
- Factor in controversy risk management in policy definitions, and enhance controversy management paired with broad TP communication actions

Because we come from in-house practice, we also integrate pragmatic features in our technical solutions. We've been there.

Beyond the specific tax situation of a group, different dimensions in TP projects need to be synchronized Reach, **Transaction related**, **Environment**



FROM OUTSOURCING TO THE MOST COLLABORATIVE APPROACHES



ADVISORY



TRUSTED ADVISOR



CO-SOURCING SOLUTIONS



TRAINING



ADVOCACY



COACHING

Conscious of the necessity for Tax departments and Finance organizations to deliver more with less and pursue their transformation and upskilling, we have developed a portfolio of services integrating - in addition to the usual features such as project based advisory, advocacy and training - collaborative shaped services directly aimed to foster knowledge and cost efficient delivery.

Our **co-sourcing** approach allows organizations to access specific expertise related to transfer pricing projects and develop their own teams as they are involved in the delivery of the solution. As your **trusted advisor**, we periodically support your organization (frequency at your convenience) with strategic transfer pricing guidance, on a fee basis. While ensuring continuity, this ensures an access to extensive TP experience at a limited cost.

We have also included a **coaching** dimension to our offer, for change management projects and organization related topics.

Cost conscious solutions that ensure know how sharing with your teams.

Adapted to your needs and to our capabilities

Independent expert vs. firms: an addition of range rather than a competition.

Independent experts can serve as **complements to both in-house teams and firms** on top of the usual advisory work they can perform. Lacking the large scale of consultancy firms, they best contribute to high added value tasks requiring specific expertise, either technical, industry specific knowledge or linked to their intimate acquaintance with in-house environments.

For compliance related tasks or to complement their expertise in certain areas, we can seek the assistance of firms or individuals

we have worked with in the past or that we can personally vouch for. Complementarity, trust and flexibility are real assets in the independent expert biosphere.

Co-sourcing activities constitute a competitive advantage for us experts raised in-house, as we are fully operational within your teams. Co-sourcing contributes to perpetuate know how and to increase ownership, and further requires a commitment from the client in terms of resources dedicated to a given project or task.

While firms like VECTOR TP can be substitutes to either in-house or firm's resources for a segment of advisory work where they can activate their technical skills and experience in transfer pricing, their added value is further unleashed when they are used as complements with specific know how.

Our core business is to address the qualitative issues companies are facing, at a competitive cost, this being eased by the absence of overhead costs.

We put at your disposal hands on expertise acquired in the most significant areas of Transfer Pricing Economics

Transfer Pricing Policy

- Design & modeling BEPS readiness

Global Value Chain

- Value drivers
- Industry analysis
- Management Approach

IP & Intangibles

- Valuation & licensing
- PPA vs. TP valuations
- Cost Sharing (OECD/US)

Business Restructuring

- Acquisition/divestments
- TP alignment
- TP Restructuring

Global Costs Allocations

- Model design
- Cost Pooling

Benchmark stress test

Operational TP Processes

- Financial efficiency test
- Design End to End
- Stage gate analysis
- Change management

Governance

- Procedures
- Stakeholder map
- Action plans
- Data integrity

Integrations

- Project Management
- Procedures

Data & Analytics

Broad Communication

- Management & Boardroom Protocols and communication toolkit
- Business oriented Masterfile
- MF/Local file CbCR: risk assessment/remediation

Economic aspects of Controversy

- Audit positions
- Resolution options analysis
- APAs & MAP design

Negotiation



Philippe Paumier

FOUNDER VECTOR TP

Independent International Transfer Pricing Economist - Strategic and Operational transfer pricing

22 years in Economics and Transfer Pricing



Graduated from ESCP-Europe in Management and Corporate Strategy and with an MSc in Development Economics, Philippe has operated as an in-house transfer pricing advisor for the last 19 years in world-class Tax departments.

During the last 10 years, Philippe has led the internal TP practice of Sanofi, a global leader in the Healthcare industry, comprised of a dozen + professionals and in charge of both Strategic and Operational transfer pricing.

Through his career, Philippe has been exposed to a large variety of projects involving policy definition, intangibles (valuation, migration), global cost allocation structures, post acquisition TP alignment, TP aspects of business restructuring, process optimization and organization. Over the years, Philippe has built a BEPS relevant expertise on Intangibles and Global Value Chain analysis.

Additionally, Philippe has also acquired firsthand international

controversy experience (audits, MAPs, BAPAs) in preparing approachable filings for complex issues and leading with the relevant administrations the negotiations till closing.

Such international exposure has also required technical and soft skills for the management of high-profile stakeholders..

Finally, Philippe has been a recognized speaker in many international TP conferences, on TP & IP, dispute resolution or recent regulatory evolutions.